

EXHIBIT C



111 East Wacker Drive, Suite 2600
Chicago, IL 60601-4208
Tel: 312.527.4000 | Fax: 312.527.4011
taftlaw.com

Sara J. Schroeder
312.836.4152
SSchroeder@taftlaw.com

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Via Email

Alexandra K. Block
ablock@aclu-il.org

Joshua M. Levin
jlevin@aclu-il.org

Roger Baldwin Foundation of ACLU, Inc.
150 North Michigan Avenue, Suite 600
Chicago, Illinois 60601

Re: *Wilkins v. City of Chicago*, No. 23-cv-4072 (N.D. Ill.) – Non-Custodial ESI Sources

Dear Counsel:

The City of Chicago and its Chicago Police Department (collectively “City”), pursuant to the Parties’ Stipulation on Electronically Stored Information and Inadvertent Disclosures (the “ESI Protocol”) (Dkt. 60), hereby provide a supplemental list of non-custodial sources from which the City intends to search for responsive Electronic Documents. The City identifies the following non-custodial sources within its respective possession, custody, or control with potential discoverable Electronic Documents relevant to Plaintiffs’ claims.

Supplemental Identification of Non-Custodial Sources of Electronic Documents

1. Offices of the mayor and deputy mayor for public safety.

a. Microsoft Exchange Applications.

Pertaining to non-custodial ESI sources within Microsoft Exchange, the offices of the mayor and deputy mayor of public safety have access to SharePoint and

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Teams. Microsoft Purview is utilized to search for content in SharePoint and Teams.

Search capabilities include search for content and keyword queries. Search for content will produce responsive content that is stored in SharePoint and Teams, and will include content generated by other Microsoft 365 apps that store data in these sites. Keyword queries may also be used to search for matching content keywords and conditions (or Booleans) may be used to narrow the scope of the search.

b. Shared Network Drive

Pertaining to non-custodial ESI on a shared network drive within the offices of the mayor and deputy mayor of public safety, the network drive potentially houses shared folders that are accessible by multiple individuals.

Documents housed in shared network folders are not reasonably searchable by keyword queries. These shared network folders, however, may be searched through a self-collection method guided by Plaintiffs' discovery requests.

c. Plaintiffs' requests related to non-custodial ESI.

The aforementioned non-custodial sources of ESI may store documents/data responsive to Plaintiffs' Request for Production Nos. 18, 60, 61, 63, and 64. Pursuant to any objection, limitation, or narrowing of the scope of these requests discussed during the parties' multiple meet and confers, the City will search for responsive electronic documents on the identified non-custodial sources of ESI.

As to not reasonably accessible ESI, no proprietary program is needed to view any of the responsive data that may be produced. Please note, that until a search is executed, it is unknown if electronic documents responsive to Plaintiffs' requests exist going back to 2016. The City will update its identification of any not reasonably accessible ESI after its search is complete.

d. Interviews.

Due to the reasonable search capability of the offices of the mayor and deputy mayor for public safety, and the limited discovery requests for which ESI data may be responsive, the City will not present any related individual for an ESI interview.

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Sincerely,

Taft Stettinius & Hollister LLP

Sara J. Schroeder

SJS
cc: All counsel of record